

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION** : MDL No.: 2875
THIS DOCUMENT RELATES TO ALL : Civil Case No.: 19:2875(RBK/JS)
CASES :
:

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
PERIPHERAL DEFENDANT AVKARE, LLC**

WHEREAS the Court entered Case Management Order No. 15, amended April 5, 2021, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-, losartan-, and irbesartan-containing drugs ("VCDs") ("LCDs") ("ICDs");

WHEREAS, Peripheral Defendant AvKARE, LLC ("AvKARE") having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and AvKARE that all current cases pending and all future cases to be filed in this MDL alleging claims against AvKARE in connection with allegedly contaminated VCDs, LCDs and ICDs be and hereby are dismissed without prejudice.

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On behalf of the Plaintiffs Executive Committee
Dated: November 17, 2021

/s/ Megan E. Grossman
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Dated: November 17, 2021